TWO MINUTE TRAINING

TO: *CH2M HILL PLATEAU REMEDIATION COMPANY*

FROM: *PAUL W. MARTIN, Senior Environmental Compliance Officer*
CHPRC Environmental Protection, Hanford, WA

SUBJECT: *PCB BALLASTS AND DISPOSAL OPTIONS*

DATE: *DECEMBER 18, 2014*

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TWO MINUTE TRAINING

SUBJECT: PCB Ballasts and Disposal Options

Q: A customer has two drums of PCB fluorescent light ballasts. One drum contains ballasts with intact and nonleaking PCB small capacitors and <50 ppm PCBs in the potting (insulating) material, while the other drum contains ballasts with intact and nonleaking PCB small capacitors and PCBs ≥50 ppm in the potting material. The customer does not want to use expensive incineration or get involved in complex sampling and analysis for both drums. How can the customer determine disposal options for these ballasts?

A: Per 40 CFR 761.50(b)(2)(i), fluorescent light ballasts containing PCBs only in intact and non-leaking PCB Small Capacitors are regulated for disposal under 40 CFR 761.60(b)(2)(ii). This means that the intact, nonleaking ballasts with no PCBs in the potting material can be landfilled as municipal solid wastes.

Then per 40 CFR 761.50(b)(2)(ii), fluorescent light ballasts containing PCBs in the potting material ≥50 ppm are regulated for disposal as PCB bulk product waste under §761.62. This means that the ballasts with PCBs ≥50 ppm in the potting material could be disposed by any of the following options:

1. In a TSCA incinerator
2. Under a PCB alternate disposal approval
3. In accordance with PCB decontamination provisions
4. For metal surfaces in contact with PCBs, per thermal decontamination provisions
5. In accordance with a TSCA PCB Coordinated Approval
6. In a TSCA chemical waste landfill
7. In a RCRA permitted hazardous waste landfill.

Therefore the customer could dispose of the nonleaking ballasts with <50 ppm PCBs in the potting material at a municipal solid waste landfill; and the nonleaking ballasts with PCBs ≥50 ppm in the potting material at a TSCA or RCRA approved facility. Note that a nonintact/leaking PCB Small Capacitor would also require management in one of the specified TSCA or RCRA facilities regardless of the PCB concentrations in the potting material.

SUMMARY:

- Fluorescent light ballasts with nonleaking PCB Small Capacitors and <50 ppm PCBs in the potting material can be disposed in a municipal solid waste landfill.
- Fluorescent light ballasts with nonleaking PCB Small Capacitors and ≥50 ppm PCBs in the potting material must be disposed in a TSCA or RCRA approved facility.
- Fluorescent light ballasts with leaking PCB Small Capacitors, regardless of PCB concentrations in the potting material must also be disposed in a TSCA or RCRA approved facility.

Excerpts from 40 CFR 761.50, 761.60, 761.62, and excerpts from the EPA PCB Q and A Manual are attached to the e-mail. If you have any questions, please contact me at "Paul_W_Martin@rl.gov" or at (509) 376-6620.

TWO MINUTE TRAINING - ATTACHMENT

SUBJECT: PCB Ballasts and Disposal Options

40 CFR 761.50 Applicability.

(b) PCB waste.

(2) PCB Items. Any person removing from use a PCB Item containing an intact and non-leaking PCB Article must dispose of it in accordance with §761.60(b), or decontaminate it in accordance with §761.79. PCB Items where the PCB Articles are no longer intact and non-leaking are regulated for disposal as PCB bulk product waste under §761.62(a) or (c).

(i) Fluorescent light ballasts containing PCBs only in an intact and non-leaking PCB Small Capacitor are regulated for disposal under §761.60(b)(2)(ii).
(ii) Fluorescent light ballasts containing PCBs in the potting material are regulated for disposal as PCB bulk product waste under §761.62.

40 CFR 761.60 Disposal requirements.

(b) PCB articles.

(2) PCB Capacitors.

(ii) Any person may dispose of PCB Small Capacitors as municipal solid waste, unless that person is subject to the requirements of paragraph (b)(2)(iv)of this section.

40 CFR 761.62 Disposal of PCB bulk product waste.

PCB bulk product waste shall be disposed of in accordance with paragraph (a), (b), or (c) of this section. Under some of these provisions, it may not be necessary to determine the PCB concentration or leaching characteristics of the PCB bulk product waste. When it is necessary to analyze the waste to make either of these determinations, use the applicable procedures in subpart R of this part to sample the waste for analysis, unless EPA approves another sampling plan under paragraph (c) of this section.

(a) Performance-based disposal. Any person disposing of PCB bulk product waste may do so as follows:
(1) In an incinerator approved under §761.70.
(2) In a chemical waste landfill approved under §761.75.
(3) In a hazardous waste landfill permitted by EPA under section 3004 of RCRA, or by a State authorized under section 3006 of RCRA.
(4) Under an alternate disposal approval under §761.60(e).
(5) In accordance with the decontamination provisions of §761.79.
(6) For metal surfaces in contact with PCBs, in accordance with the thermal decontamination provisions of §761.79(c)(6).
(7) In accordance with a TSCA PCB Coordinated Approval issued under §761.77.

TWO MINUTE TRAINING - ATTACHMENT

SUBJECT: PCB Ballasts and Disposal Options

January 2009 Version
Revisions to the PCB Q and A Manual

Q: ***How must I dispose of fluorescent light ballasts with PCBs in the potting material?***

A: This depends on the concentration of PCBs in the potting material and whether the ballast contains an intact or non-intact PCB small capacitor. **If** the PCB concentration of the potting material is <50 ppm and the ballast contains either no PCB small capacitor or an intact and non-leaking PCB small capacitor, you can dispose of the ballast as municipal solid waste (see §761.60(b)(2)(ii)). **If** the PCB concentration of the potting material is ≥50 ppm and the ballast contains either no PCB small capacitor or an intact and non-leaking PCB small capacitor, you can dispose of the ballast as PCB bulk product waste in a TSCA incinerator, a TSCA/RCRA landfill, a facility permitted, licensed, or registered by a state as a municipal or non-municipal non-hazardous waste landfill, or by means of an approved destruction method, decontamination, or risk-based disposal method (see §761.62). **Regardless** of the PCB concentration of the potting material, you must dispose of ballasts containing non-intact or leaking capacitors as PCB bulk product waste in accordance with §761.62(a) or (c).

TSCA Disposal Requirements for Fluorescent Light Ballasts

PCB Capacitor	PCB Potting Material	Labeling, Transportation and Manifesting for Disposal	Disposal References	Disposal Options
"No PCBs" mark	N/A	Non-TSCA	N/A	Non-TSCA
None (No capacitors)	<50 ppm	Non-TSCA	N/A	Non-TSCA
Intact and Non-leaking or None	≥ 50 ppm	• Is a PCB Bulk Product Waste • No marking is required • Manifest required for 761.62(a) • Manifest not required for 761.62(b) • Manifest may be required for 761.62(c)	761.50(b)(2)(ii) 761.62(a) – (c)	• TSCA incinerator - 761.70 • TSCA/RCRA Landfill - 761 .75 • Alternate Destruction Method - 761.60(e) • Decontamination - 761.79 (761.65(d) storage approval may be required) • Coordinated approval - 761.77 • State landfill (leach test) - 761.62(b) • Risk-based approval - 761.62(c)
Intact and Non-leaking	<50 ppm	No marking or manifesting required	761.50(b)(2)(i) 761.60(b)(2)(ii)	Municipal solid waste or 761 Subpart D options
Leaking	<50 or ≥50 ppm	• Disposal as PCB Bulk Product Waste • No marking is required • Manifest required for 761.62(a) • Manifest may be required for 761.62(c)	761.62(a) or 761.62(c)	• TSCA incinerator - 761.70 • TSCA/RCRA Landfill - 761 .75 • Alternate Destruction Method - 761.60(e) • Decontamination - 761.79 (761.65(d) storage approval may be required) • Decontamination - 761.79 • Coordinated approval - 761.77 • Risk-based approval - 761.62(c)